

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

COSTING TREATMENT OF RETIREMENT DEBT
RELIEF

PERIODIC REPORTING (PROPOSAL EIGHT)
(RETIREE HEALTH BENEFIT NORMAL COSTS)

Docket No. RM2023-1

Docket No. RM2023-3

**MOTION OF THE UNITED STATES POSTAL SERVICE FOR LEAVE TO FILE
CONSOLIDATED OR CONCURRENT RESPONSES TO MAILERS'
DECEMBER 19TH FILING
(December 20, 2022)**

On December 19, 2022, under the above docket headings, a consortium of mailer representatives (Mailers) filed a pleading styled as “Motion For Reconsideration or, in the Alternative, Petition to Initiate a Proceeding Regarding the Appropriate Analytical Principle for Retiree Health Benefit Normal Costs.” This pleading was filed in response to (e.g., sought reconsideration of) Order No. 6363 (December 9, 2022). Order No. 6363 (at pages 10-12) clearly anticipated that both the Postal Service and the Mailers might submit further pleadings with respect to the issues addressed in that Order, and indicated (at 12) the Commission’s intention to allow two weeks for response to any such further pleadings.

The instant request, however, is precipitated by the Mailers’ unexpected inclusion in their pleading of a motion for reconsideration. Under the rules (specifically section 3010.160), it would appear that the normal response period for such a motion, barring establishment of an alternative deadline, is seven days. Of course, in addition to the motion, the pleading in the alternative seeks initiation of a rulemaking docket, precisely

as anticipated in Order No. 6363. The Postal Service is thus seeking establishment by the Commission of an alternative deadline of no less than two weeks for response to all aspects of the Mailers' December 19th submission. Not only would such a deadline be fully in accord with the apparent intent of Order No. 6363, but given the other pressing concerns faced by the Postal Service to prepare the ACR filing (i.e., the complete set of materials around which these particular issues are swirling), it would be entirely impractical to even attempt to respond separately to the motion under a seven-day deadline. The need for establishment of a longer deadline is thus compelling.

One consolidated response would seem administratively more convenient, given the extreme level of entanglement amongst all of the issues raised, but if the Commission for any reason prefers separate responses to the motion and the petition, the Postal Service requests leave to file those responses concurrently in accordance with the specified new deadline.

The Postal Service has consulted with representatives of the Mailers and is authorized to indicate that Mailers consent to this request.

Accordingly, the Postal Service respectfully request establishment by the Commission of an alternative deadline of no less than two weeks for response to all

aspects of the Mailers' December 19th submission.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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